

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	Case No. 3:21CR00157-JJH
)	
Plaintiff,)	JUDGE HELMICK
)	
Vs.)	
)	<u>Motion For Individualized</u>
SIR MAEJOR PAGE,)	<u>Sequestered Voir Dire on Issues</u>
)	<u>Related to Race</u>
Defendant.)	
)	Charles M. Boss (0011436)
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)	
)	ATTORNEY FOR DEFENDANT
)	SIR MAEJOR PAGE
)	

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Now Comes Defendant Sir Maejor Page, by and through counsel Charles M. Boss, to respectfully request that this court permit Individualized Sequestered Voir Dire on Issues Related to Race.

There can be no doubt that the issues relating to race can be highly contentious and potentially inflammatory. For this reason, the defendant believes that potential jurors should be questioned on issues relating to race individually. Individual questioning would permit each juror to discuss their experiences and perspectives fully and candidly without concern regarding how the response may be perceived by the remainder of the potential

panel. Individualized Voir Dire would also avoid the potential of tainting other potential jurors if the responsive comments become problematic.

The specific areas of race related questions anticipated will include the death of George Floyd, the death of Brianna Taylor, the Black Lives Matter movement, Civil Rights protests and Albinism.

WHEREFORE, Defendant Page respectfully requests that this court permit Individualized Sequestered Voir Dire on Issues Related to Race.

Respectfully submitted,

BOSS & VITOU Co., L.P.A.

/s/ Charles M. Boss

By: Charles M. Boss
Attorney for Defendant
Sir Maejor Page

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the **Motion For Individualized Sequestered Voir Dire on Issues Related to Race** was filed electronically this 25th day of July, 2023. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic receipt.

Respectfully submitted,

BOSS & VITOU Co., L.P.A.

/s/ Charles M. Boss

By: Charles M. Boss
Attorney for Defendant
Sir Maejor Page